

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

ALEJANDRO MIGUEL LEON MAAL,
a/k/a "Alejandro Leon,"

Defendant.

SUPERSEDING INDICTMENT

S1

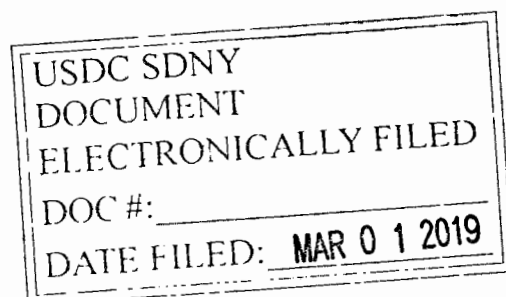
S(1) 19 CRIM 144

COUNT ONE

(Conspiracy to Violate and Evade the Foreign Narcotics Kingpin
Designation Act and the Kingpin Act Regulations)

The Grand Jury charges:

1. From at least in or about February 2017, up to and including in or about March 2019, in the Southern District of New York, Venezuela, Turkey, Russia, the Dominican Republic, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, knowingly and willfully combined, conspired, confederated, and agreed together and with each other to violate one or more of the provisions of the Foreign Narcotics Kingpin



Designation Act ("Kingpin Act") and related Kingpin Act regulations.

2. It was a part and an object of the conspiracy that ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by a United States person, and within the United States, in property and interests in property of one or more foreign persons designated as Specially Designated Narcotics Traffickers by the Secretary of the Treasury pursuant to Title 21, United States Code, Section 1904(b), in violation of Title 21, United States Code, Section 1904(c)(1), and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.

3. It was further a part and an object of the conspiracy that ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by a United States person, and within the United States, that evaded and avoided, and had the effect of evading and avoiding, one or more of the prohibitions contained in the Kingpin Act, in violation of Title 21, United States Code, Section 1904(c)(2), and Title 31, Code of Federal Regulations, Section 598.204.

4. It was further a part and an object of the conspiracy that ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro

Leon," the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by one or more United States persons who were officers, directors, and agents of an entity -- to wit, LEON MAAL acting as an agent of American Charter Services LLC and an agent of SVMII Solution LLC -- and within the United States, in property and interests in property of one or more foreign persons designated as Specially Designated Narcotics Traffickers by the Secretary of the Treasury pursuant to Title 21, United States Code, Section 1904(b), in violation of Title 21, United States Code, Sections 1904(c)(1) and 1906(a)(2), and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.

5. It was further a part and an object of the conspiracy that ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, and others known and unknown, would and did engage and attempt to engage in transactions and dealings by one or more United States persons who were officers, directors, and agents of an entity -- to wit, LEON MAAL acting as an agent of American Charter Services LLC and an agent of SVMII Solution LLC -- and within the United States, that evaded and avoided, and had the effect of evading and avoiding, one or more of the prohibitions contained in the Kingpin Act, in violation of Title 21, United

States Code, Sections 1904(c)(2) and 1906(a)(2), and Title 31, Code of Federal Regulations, Section 598.204.

Overt Act

6. In furtherance of the conspiracy and to effect the illegal objects thereof, ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, committed the following overt act, among others:

a. On or about January 28, 2018, LEON MAAL used an email account associated with American Charter Services LLC to send a message related to private charter flights on board a U.S.-registered aircraft for, among others, relatives and associates of a Specially Designated Narcotics Trafficker designated pursuant to the Foreign Narcotics Kingpin Designation Act.

(Title 21, United States Code, Sections 1904(c)(1)-(2) and 1906(a)(1)-(2); Title 18, United States Code, Section 3238; Title 31, Code of Federal Regulations, Sections 598.203(a), 598.204, and 598.406.)

COUNT TWO

(Prohibited Transactions in Violation of the Foreign Narcotics Kingpin Designation Act and the Kingpin Act Regulations)

The Grand Jury further charges:

7. From at least in or about February 2017, up to and including in or about March 2019, in the Southern District of New York, Venezuela, Turkey, Russia, the Dominican Republic, and elsewhere, and in an offense begun and committed out of the

jurisdiction of any particular state or district of the United States and for which at least one of two or more joint offenders is expected to be first brought to and arrested in the Southern District of New York, ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, knowingly engaged, attempted to engage, and aided, abetted, and caused others to engage and attempt to engage in transactions and dealings by one or more United States persons who were officers, directors, and agents of an entity -- to wit, LEON MAAL acting as an agent of American Charter Services LLC -- and within the United States, in property and interests in property of one or more foreign persons designated as Specially Designated Narcotics Traffickers by the Secretary of the Treasury pursuant to Title 21, United States Code, Section 1904(b).

(Title 21, United States Code, Sections 1904(c)(1) and 1906(a)(2); Title 18, United States Code, Sections 3238 and 2; and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.)

COUNT THREE

(Evasion of the Foreign Narcotics Kingpin Designation Act and the Kingpin Act Regulations)

The Grand Jury further charges:

8. From at least in or about February 2017, up to and including in or about March 2019, in the Southern District of New York, Venezuela, Turkey, Russia, the Dominican Republic, and elsewhere, and in an offense begun and committed out of the

jurisdiction of any particular state or district of the United States and for which at least one of two or more joint offenders is expected to be first brought to and arrested in the Southern District of New York, ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, knowingly engaged, attempted to engage, and aided, abetted, and caused others to engage and attempt to engage in transactions and dealings by one or more United States persons who were officers, directors, and agents of an entity -- to wit, LEON MAAL acting as an agent of American Charter Services LLC -- and within the United States, that evaded and avoided, and had the effect of evading and avoiding, one or more of the prohibitions contained in the Kingpin Act.

(Title 21, United States Code, Sections 1904(c)(2) and 1906(a)(2); Title 18, United States Code, Sections 3238 and 2; and Title 31, Code of Federal Regulations, Section 598.204.)

COUNT FOUR

(Prohibited Transactions in Violation of the Foreign Narcotics Kingpin Designation Act and the Kingpin Act Regulations)

The Grand Jury further charges:

9. From at least in or about February 2017, up to and including in or about March 2019, in the Southern District of New York, Venezuela, Turkey, Russia, the Dominican Republic, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United

States and for which at least one of two or more joint offenders is expected to be first brought to and arrested in the Southern District of New York, ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, knowingly engaged, attempted to engage, and aided, abetted, and caused others to engage and attempt to engage in transactions and dealings by a United States person who was an officer, director, and agent of an entity -- to wit, LEON MAAL acting as an agent of SVMi Solution LLC -- and within the United States, in property and interests in property of one or more foreign persons designated as Specially Designated Narcotics Traffickers by the Secretary of the Treasury pursuant to Title 21, United States Code, Section 1904(b).

(Title 21, United States Code, Sections 1904(c)(1) and 1906(a)(2); Title 18, United States Code, Sections 3238 and 2; and Title 31, Code of Federal Regulations, Sections 598.203(a) and 598.406.)

COUNT FIVE

(Evasion of the Foreign Narcotics Kingpin Designation Act and the Kingpin Act Regulations)

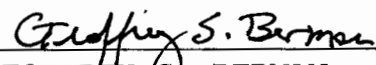
The Grand Jury further charges:

10. From at least in or about February 2017, up to and including in or about March 2019, in the Southern District of New York, Venezuela, Turkey, Russia, the Dominican Republic, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United

States and for which at least one of two or more joint offenders is expected to be first brought to and arrested in the Southern District of New York, ALEJANDRO MIGUEL LEON MAAL, a/k/a "Alejandro Leon," the defendant, knowingly engaged, attempted to engage, and aided, abetted, and caused others to engage and attempt to engage in transactions and dealings by a United States person who was an officer, director, and agent of an entity -- to wit, LEON MAAL acting as an agent of SVMII Solution LLC -- and within the United States, that evaded and avoided, and had the effect of evading and avoiding, one or more of the prohibitions contained in the Kingpin Act.

(Title 21, United States Code, Sections 1904(c)(2) and 1906(a)(2); Title 18, United States Code, Sections 3238 and 2; and Title 31, Code of Federal Regulations, Section 598.204.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

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a/k/a "Alejandro Leon,"

Defendant.

SUPERSEDING INDICTMENT

(21 U.S.C. §§ 1904, 1906; and
18 U.S.C. §§ 3238, 2.)

GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL

Sanjiv Chandra Foreperson.

3/1/19
Mr. John L. [unclear]
ms. [unclear]